

EXHIBIT 2

9 HIGHLY CONFIDENTIAL
10 Wednesday, November 16, 2022
11
12 Remote videotaped deposition of
13 CARRIE GRIFFITHS, held at the location of the witness
14 in Boston, Massachusetts, commencing at 9:09 a.m., on
15 the above date before Carol A. Kirk, Registered Merit
16 Reporter, Certified Shorthand Reporter, and Notary
17 Public.

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1 Q. The couple of times that you
2 watched or listened to the trial via Zoom, did
3 you do so at someone's instruction, or did you
4 do so on your own accord?

5 A. My own accord.

6 Q. Who do you report to directly at
7 Veolia North America?

8 A. Our chief executive officer.

9 Q. When you took the role that you
10 currently have in 2018 at Veolia North America,
11 who was it that you replaced in that position?

12 A. I think -- it was a woman, and I
13 cannot remember her name.

14 Q. No problem.

15 Are you aware of whether Veolia
16 North America at any point in time between 2016
17 and today participated in a Google keyword or
18 AdWord campaign?

19 A. Yes, I am.

20 Q. And did Veolia participate in such
21 a campaign?

22 A. Yes, it did.

23 Q. Is that campaign ongoing?

24 A. Yes, it is.

1 conversation be with you and Jace or with you,
2 Jace, and some others, and then Mr. Kramer
3 wanted some specificity about which campaign I'm
4 referring to.

5 So going back to my question about
6 that conversation that you said Jace would have
7 to have with you, would that be exclusively with
8 you, or would it include others?

9 MR. KRAMER: Object to the
10 preface, but you can answer the
11 question.

12 A. These ads were set up before I
13 came to the company, and they've been running
14 along without any change on my part or Jace's
15 part. Any changes to that campaign would be a
16 conversation that I would have with
17 headquarters.

18 Q. And if you were to have that
19 conversation at headquarters -- I know that in
20 your corporate world, these are just normal
21 words that you use. Headquarters -- what do you
22 mean by "I would have a conversation with
23 headquarters" or at headquarters. Who are you
24 referring to?

1 A. I don't know.

2 Q. Are you aware of the Tiger Joyce
3 op-ed that appeared in the Detroit News about a
4 week before the article we've been discussing
5 appeared?

6 A. I am not.

7 Q. Okay. Do you know whether Rich
8 has participated in the placement of op-eds
9 across the United States or other places in the
10 world that were written by somebody outside of a
11 Veolia entity?

12 MR. KRAMER: Objection.

13 A. I don't know.

14 Q. Is it possible?

15 MR. KRAMER: Objection.

16 A. I don't know.

17 Q. Are you aware of whether Veolia
18 has ever tried to find a friendly voice to pen
19 an op-ed that either directly or indirectly
20 supports Veolia's activities?

21 MR. KRAMER: Are you talking about
22 any topic any time ever?

23 MR. STERN: Yeah.

24 A. I don't know. It's not unusual.

1 March of 2022?

2 A. Suez North America.

3 Q. And so as part of the merger with
4 Suez, Rich became a Veolia North America
5 employee as opposed to his previous employment
6 with Suez; is that correct?

7 A. Correct.

8 Q. If I wanted to know if Veolia ever
9 participated in the publication of an op-ed
10 after March of 2022, would Rich be the person
11 who I would ask that question to?

12 A. Yes.

13 Q. If I wanted to know if anyone from
14 Veolia played any role whatsoever in the
15 placement of a Tiger Joyce article in the
16 Detroit News in either late August or early
17 September 2022, would Rich be the person to ask
18 that question to?

19 A. I don't know.

20 Q. Do you know who Tiger Joyce is?

21 A. I have no idea.

22 Q. Did you interact with any of the
23 attorneys who were actually trying the first
24 Flint bellwether case at any point in time

1 Q. Have you ever seen a document like
2 it?

3 A. Yes.

4 Q. Okay. In what context have you
5 seen a document like this document?

6 A. In preparation for this
7 deposition, I looked at some data.

8 Q. Do you have any sense of what the
9 data is that I'm looking at in this document
10 based on your preparation for the deposition and
11 other documents you looked at that are like it?

12 A. If this is related to the Google
13 ad campaign as it relates to the Detroit News
14 article, then this shows who was interested in
15 the Flint lawsuit or with Veolia. These reflect
16 the keywords that are typed into a search engine
17 by people interested in those keywords. So any
18 numbers for any states reflect how many people
19 were interested in that geography related to
20 those keywords.

21 Q. But you don't have an --

22 A. It's reasonable --

23 Q. I'm sorry. I interrupted you. I
24 interrupted you. I'm sorry. If you could start

1 that part of your answer over. I didn't mean to
2 talk over you.

3 A. It's reasonable that Michigan
4 would have a higher amount because of the
5 interest of people in that state.

6 Q. You understand that -- do you
7 understand that dynamic ads have no bearing --
8 strike that.

9 Do you understand that keywords
10 have absolutely nothing to do with dynamic ads?

11 MR. KRAMER: Objection.

12 A. I don't understand that.

13 Q. Do you technically -- from an
14 absolute technical standpoint, do you know the
15 difference between keyword campaigns and dynamic
16 ad campaigns?

17 A. I don't.

18 Q. You're the director of
19 communications for Veolia North America. If, in
20 fact, Veolia North America was engaging in both
21 a keywords campaign and a dynamic ad campaign,
22 who would be the person that works for you who
23 could talk intelligently about the differences
24 between those two campaigns and why Veolia

1 MR. KRAMER: Objection; misstates
2 testimony.

3 A. I didn't create those
4 advertisements.

5 Q. You mentioned that as to the Flint
6 water crisis and any dynamic ads that Veolia may
7 have engaged, you had no role whatsoever in
8 those dynamic ads, right?

9 MR. KRAMER: Objection.

10 A. I didn't create those ads.

11 Q. Okay. You mentioned that you had
12 no role whatsoever in the production of tweets
13 from the VNA Flint Facts Twitter account, right?

14 MR. KRAMER: Object to form.

15 A. Correct.

16 Q. So how did you know that anything
17 in the article related to Veolia advertisements
18 was inaccurate?

19 A. I checked with my team for the
20 data, made sure that we were not targeting
21 jurors or targeting anything specifically other
22 than the United States and Canada, and I was
23 assured that we weren't.

24 Q. What data did you look at?

1 CERTIFICATION

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3 I, Carol A. Kirk, Registered Merit Reporter and
4 Certified Shorthand Reporter, do hereby certify that
5 prior to the commencement of the examination,
6 CARRIE GRIFFITHS, was duly remotely sworn by me to
7 testify to the truth, the whole truth, and nothing but
8 the truth.

9 I DO FURTHER CERTIFY that the foregoing is a
10 verbatim transcript of the testimony as taken
11 stenographically by me at the time, place, and on the
12 date hereinbefore set forth, to the best of my
13 ability.

14 I DO FURTHER CERTIFY that I am neither a
15 relative nor an employee nor attorney nor counsel of
16 any of the parties to this action, and that I am
17 neither a relative nor employee of such attorney or
18 counsel, and that I am not financially interested in
19 the action.

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22 Carol A Kirk

23 Carol A. Kirk, RMR, CSR
Notary Public

24 Dated: November 22, 2022